

1. OBJECTIVE

This Code of Business Conduct & Ethics (“Document”) has been developed for MBM Resources Berhad (“MBMR”) and its Subsidiaries (“MBMR Group” or “the Group”), to provide guidance on the standards of behaviour expected of directors and employees of the MBMR Group and where applicable, third parties, which shall include, but not be limited to counterparties and business partners.

2. SCOPE & APPLICABILITY

This Document specifically, applies to all directors and employees of MBMR and the Group, including those on secondment to joint ventures, affiliates or associates and extends to counterparties. Where possible, business partners are encouraged to adopt similar principles and standards of behaviour. This Document applies regardless of geographic location of the Subsidiaries.

3. DEFINITIONS & INTERPRETATIONS

“Approving Authority”	refers to the applicable approving authority in respect of a particular matter with reference to the Group’s LOA;
“Board”	Board of Directors of the relevant companies within the Group;
“Document”	refers to this Code of Business Conduct and Ethics document;
“Company”	refers to the relevant company or Subsidiary within the MBMR Group to which the employee or director is engaged or employed;
“HOD(s)”	refers to Head(s) of Division/Department, as may be applicable;
“LOA”	refers to Limits of Authority;
“MBMR”	refers to MBM Resources Berhad;
“MBMR Group”	refers collectively to MBMR and its Subsidiaries;

“MBMR Group SHCM”	refers to the Group Strategic Human Capital Management Division of the MBMR Group.
“Subsidiary/ies”	refers to a subsidiary or subsidiaries of MBMR, as may be applicable, as defined in the Companies Act 2016.
“User(s)”	refers to User(s) of this Document, in its original form, shall be restricted to the Subsidiary’s human capital management department/division and parties with the relevant LOA within the particular Subsidiary. However, this Document or an extract thereof may, if deemed necessary and with the prior written approval of MBMR, be shared with parties other than that specified herein.

4. GENERAL PRINCIPLES

MBMR places great emphasis on fair, honest and ethical behaviour in conducting business and shall at all times, uphold integrity throughout the Group.

Sound judgement is to be exercised by all relevant parties in making the right decision.

5. RESPONSIBILITY AND COMPLIANCE

Apart from understanding and complying with this Document, directors or employees, are also responsible to:

- Ensure those reporting to them understand and comply with the provisions of this Document;
- Promote compliance and good ethical values via leadership by example; and
- Provide guidance to others who have raised concerns or questions regarding the provisions of this Document.

All directors and employees of the Group must read and declare compliance with the provisions of this Document upon appointment to or joining the Group and may be subjected to disciplinary action, up to and including termination of employment or dismissal, for violating the provisions of this Document. Violations that are related to criminal acts may result in prosecution after referral to the appropriate authorities.

Counterparties are also required to understand and comply with the relevant aspects of this Document. Violations may result in blacklisting by the Group.

Business Partners are encouraged to adopt similar principles and standards of behaviour.

The administration of the COBCE shall be under the responsibility of the Head of Group Strategic Human Capital Management.

6. WORKPLACE ENVIRONMENT

6.1 Professionalism and Respect

Professionalism is expected at all levels within the Group and this applies in all forms communication within the Group and externally and the image and appearance portrayed. Superiors, peers, subordinates and external stakeholders are to be treated with respect, trust, honesty and dignity.

6.2 Equal Opportunity and Non-Discrimination

The Group provides equal opportunities to all and endeavours to ensure that employment-related decisions are based on relevant qualifications, merit, performance and other job-related factors and requirements in compliance with all applicable laws and regulations.

There shall be no discrimination based on gender, race, disability, nationality, religion or age unless specific laws or regulations expressly provide for selection according to specific criteria.

6.3 Harassment and Violence

Harassment and violence of any kind will not be tolerated. These actions or behaviours include derogatory comments based on gender, racial or ethnic characteristics, and unwelcomed sexual advances, spreading of malicious rumours or use of emails, voicemail and other forms of communication channels to transmit derogatory or discriminatory material.

6.4 Health and Safety

The Group places high importance on providing a safe and healthy workplace for all employees. As such, directors and employees must diligently comply with health and safety laws, regulations and guidelines that apply to the Company's business and operations.

6.5 Illegal Substances

Use, storage or transfer of illegal drugs or other illegal substances in the workplace is strictly prohibited.

6.6 Criminal Activities

There shall not be any involvement in behaviour or activities that may be categorised as subversive or commission of any wrongdoing, criminal or otherwise that is punishable under the laws of any country. Any party found guilty by a court of law or found to be involved in subversive activities or commits a criminal offence, will be dealt with in accordance with the GHCP07: Disciplinary & Grievance Policy.

6.7 Human Rights

The Group has a responsibility to respect, support and uphold fundamental human rights and this applies to all employees. Where adverse human rights impacts arise from the business/activities of the Subsidiaries, the respective Subsidiaries shall endeavour to mitigate the negative effects and where possible, address and resolve such impacts in a timely manner.

The Group shall ensure standards and practices are in compliance with all applicable local legislations and to the best possible extent, be consistent with internationally recognised principles and standards. Among others, the Group is committed to the following:

- (i) Providing equal opportunities;
- (ii) Respecting freedom of association;
- (iii) Eradicating any form of exploitation;
- (iv) Ensuring favourable working conditions;
- (v) Respecting community rights;
- (vi) Eliminating violence and sexual harassment; and
- (vii) Prohibition of child and forced labour.

6.8 Personal Data Protection

The Group respects the privacy and confidentiality of all employees, directors, counterparties, business partners and clients/customers' personal data. Personal data should be kept private and protected, unless access is granted for legitimate business purposes.

Subsidiaries with access to personal data shall comply with the Personal Data Protection Act 2010 and any policies, procedures and/or processes issued or to be issued in relation thereto. Appropriate measures shall be taken by Subsidiaries dealing with personal data in terms of collection, processing, disclosure, security, storage and retention.

7. CONFLICTS OF INTERESTS

7.1 General Guidance

A conflict of interest generally arises when any director or employee in the Group is in a position to take advantage of his/her role in the Group for personal benefit, including the benefit his/her family/household and friends, by placing his/her personal, social, financial or political interests before the interests of the respective Subsidiary or the Group.

Directors and employees are generally expected to avoid conflicts of interest, and situations that have the potential to generate conflicts of interest.

Use of office position, confidential information, assets or other resources for personal gain, or for the advantage of others with directors or employees are related or associated, is prohibited.

Any potential conflict of interest should be cleared with the respective HOD(s)/ or human capital management department/division. A failure to disclose fully the nature and scope of a conflict of interest may result in disciplinary action.

7.2 Reporting of Conflicts of Interests

An employee who is in a situation of actual or potential conflict must disclose the conflict as soon as the situation arises to the respective HOD(s) for approval in accordance with the respective Company's LOA. The HOD(s) shall consult with the relevant party to facilitate deliberation, depending on the nature of the conflict. The HOD(s) shall then take such action as is considered necessary to safeguard the interests of the respective Company and/or Group.

Directors in a similar situation must disclose the conflict for review by the Audit Committee, and where relevant, the prior approval of shareholders must be sought, in accordance with applicable laws and regulations.

Upon consultation and approval, the employee is required to comply with all requirements and agreed action plan to resolve the conflict. In the event that the conflict is still ongoing or remains unresolved, the employee is expected to use its best endeavours to take the necessary action in order to avoid or cease the situation of conflict, whilst continuing to disclose the conflict of interest and submit the form annually.

7.3 Dealings with Suppliers, Clients/Customers, Agents and Competitors

Any director or employee or their family members are not encouraged to have any interest including financial in a supplier, customer, agent or competitor of the Group. Where any such interest arises or may potentially arise, a declaration of interest is required to be made by directors and employees to the Company, in the prescribed form and format.

7.4 Personal Dealings with Supplier and Clients/Customers

Personal dealings with suppliers, clients/customers are strongly discouraged. However, should there be any intention to enter into personal business dealings, by a director or an employee, the director or employee is required to disclose the details of the intended dealings to the Board or Chief Executive Officer respectively for the Board or Audit Committee to determine whether such personal business dealings are on an arms-length basis (e.g. purchases which are on no more favourable terms than those offered to the public) and whether such transactions are allowed to proceed.

7.5 Outside Employment and Activities Outside the Group

Full-time employees shall not take up employment outside the Group or engage in any outside business/service which may be in competition with the Group or give rise to actual or perceived or potential conflict of interests with their duties in the Group. Among others, it is considered a conflict of interest if an employee:

- (i) Conducts the employee's private affairs, including business activities, other than the Company's business at any time within the vicinity of the Company's premises; or

- (ii) Acquires or participates in any business or employment activities outside of the Subsidiary's working hours that demands time and effort that is detrimental to the employee's work performance in the Company; or
- (iii) Engages in any dealings or activities which may place the employee in a position or any manner which gives rise to conflict between his interest and those of the Company or the Group. This provision also applies to such dealings and activities executed by any person on the employee's behalf.

Unless prior written approval is obtained, employees are not allowed to be a member of the government, quasi-government or statutory bodies or become office bearers, council member, committee member of trade or professional associations. This restriction does not apply to social or community-related clubs and associations.

7.6 Board Membership

Employees of the Group are required to disclose details of board appointments prior to being employed by the Group, as part of the respective Company's recruitment process. Any intended Board appointments which are private in nature, during the employee's service requires the approval of the Chief Executive Officer and/or the Board's Nomination and Remuneration Committee. Any fees and/or remuneration paid in connection with any appointment approved by the Chief Executive Officer and/or Board's Nomination and Remuneration Committee may be retained by the respective employee.

Employees within the Group may be appointed as a Board member of a Subsidiary/ Subsidiaries and/or associated companies. Where such appointments are made, the employees appointed shall not be paid any fees and/or remuneration in relation to such appointments unless otherwise agreed upon at the sole discretion of the Company.

7.7 Family Members and Personal Relationships

A director or employee should not hire, recommend hiring, exert influence over hiring decisions, supervise, affect terms and conditions of employment or influence the management of any family members or personal relationships engaged by the Group. Family members of Directors or Employees may be hired as Employees or consultants only if the appointment is based on qualification, performance, skills and experience, and in accordance with the Group's recruitment policies.

A director or employee should declare any relationship with family members and/or any personal relationships with any other director or employee within the Group.

A director or an employee must also disclose business activities in the Group which involve themselves, family members or personal relationships, not participate in any discussions and be excluded from voting for any directly/indirectly interested contracts.

Any substantial interest held by the director's or employee's family members in a competing company or other related companies must be declared.

Personal relationships may be defined as any relationship that may influence or be perceived to influence the objectivity of any decision in relation to the other party.

7.8 Investment Activities

Personal investment decisions made by a director or an employee must not influence his/ her independent judgement on behalf of the Group.

8. BRIBERY AND CORRUPTION

Directors and employees are to comply with all applicable anti-bribery and corruption laws and regulations in Malaysia and where applicable, in countries in which the Group operates.

All forms of bribery and corruption are strictly prohibited. The Group upholds a zero-tolerance approach towards bribery and corruption. In addition to the prohibition on bribery, directors and employees must not participate in any corrupt activity, such as extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering. Even the perception of bribery or any behaviour that could give rise to suspicion of bribery is to be avoided.

Bribery may take the form of anything of value including but not limited to money, goods, services, property, privilege, employment position or preferential treatment. Employees shall not therefore, whether directly or indirectly, offer, give, receive or solicit any item of value, in the attempt to illicitly influence the decisions or actions of a person in a position of trust within an organisation, either for the intended benefit the Group or the persons involved in the transaction.

All directors and employees must familiarise themselves with the Group's Anti-Bribery and Anti-Corruption Policy ("GRMCP01") and its corresponding framework and/or procedures (where applicable) and strictly adhere to the provisions therein at all times. No Employee will suffer demotion, penalty or other adverse consequences for refusing to pay or receive bribes or other illicit behaviour, even if such refusal may result in the Group losing business or experiencing a delay in business operations.

8.1 Gifts, Entertainment and Travel

Directors, employees and/or their family members are strictly prohibited from directly or indirectly, receiving or providing any gifts, entertainment and travel to influence business decisions or with a view to improperly cause undue influence on any party in exchange for some future benefit or result.

Any gifts, entertainment and travel expenses provided or received in relation to the director's or employee's position or employment in the MBMR Group must be in compliance with the non-negotiable/compulsory requirements which are that they:

- (a) must be lawful, unsolicited and void of any corrupt / criminal intent whatsoever;
- (b) must not under any circumstances be in the form of cash or cash equivalent, gift certificates, loans, commissions, kickbacks, coupons, discounts or any other equivalent or related forms;
- (c) must not affect or be perceived to affect any business judgment, actions or decisions of the recipient;
- (d) must not give rise to any expectation of any specific favour or improper advantages from the intended recipients;
- (e) must be given or received in an open and transparent manner;
- (f) must be within the thresholds detailed in the Group's Anti-Bribery and Anti-Corruption Policy ("GRMCP01") or otherwise approved by the relevant Approving Authority

8.1.1 Investment Activities

While a Company may be allowed to provide gifts, directors and employees should not solicit gifts from counterparties or business partners, whether directly or indirectly.

However, employees are not prohibited from accepting gifts or tokens given by counterparties or business partners provided that they comply with the above stated non-negotiable/compulsory requirements and are recorded, declared and approved in accordance with the Group's Anti-Bribery and Anti-Corruption Policy ("GRMCP01").

Further, the following may generally be regarded as acceptable gifts:

- (a) Exchange of gifts at the company-to-company level (e.g. gifts exchanged between companies as part of an official company visit/courtesy call and thereafter said gift is treated as company property)
- (b) Gifts from company to external institutions or individuals in relation to the company's official functions, events and celebrations (e.g. commemorative gifts or door gifts offered to all guests attending the event)
- (c) Gifts from MBMR or its Subsidiaries to employees and directors and/or their family members in relation to an internal or externally recognised Company function, event and celebration (e.g. in recognition of an employee's/director's service to the Company)
- (d) Token gifts of nominal value normally bearing the MBMR or its Subsidiaries company's logo or (e.g. t-shirts, pens, diaries, calendars and other small promotional items) that are given out equally to members of the public, delegates, customers, partners and key stakeholders attending events such as conferences, exhibitions, training, trade shows etc. and deemed as part of the company's brand building or promotional activities.

While offering of gifts are on occasions necessary to promote good business relationships, directors and employees must be sensitive to the recipient organisation's gifts receiving policy.

8.1.2 Entertainment

Directors or employees and their family members must not solicit any form of entertainment from counterparties or business partners directly or indirectly.

Invitations to social events or entertainment are permitted within reason, according to the scope of an employee's work provided these events or entertainment are not lavish or become a regular feature that may influence business decision making process.

Directors and employees must not accept or engage in any entertainment that is indecent, sexually oriented or those that might put such director or employee in a position of conflict or those that can adversely affect the Group's reputation. Examples of entertainment that are strictly prohibited by the Group includes, but is not limited to karaoke, body massage, call girls, social escorts, prostitutes and any other entertainment of a similar nature.

Entertainment offered by the Group is limited to food and beverage only, subject to the prior approval of the relevant HOD(s), Chief Executive Officer, or any other approving authority prescribed in the respective Company's LOA.

8.1.3 Travel

Directors and employees may accept lodging and other expenses (e.g. food, transportation) provided by counterparties, business partners or other stakeholders within the host country if the trip is for business purposes and prior approval has been obtained from the relevant Approving Authority pursuant to the Company's LOA.

Unless prohibited by law or the policy of the recipient organisation, the Group may bear the costs of transportation and lodging for counterparties, business partners or other stakeholders in connection with a visit to the Group's facility. The visit must be for a legitimate business purpose e.g. on-site examination of equipment, contract negotiations or training. Prior approval from the relevant Approving Authority under the Company's LOA in accordance with established procedures must be obtained.

8.2 Donations and Sponsorships

The Group may give donations and sponsorships as part of its commitment to society and a way of contributing to worthy causes. However, to prevent the risk of perceived bribery and corruption, directors or employees must ensure that all donations and sponsorships on behalf of the Group are given in compliance with the Group's Anti-Bribery and Anti-Corruption Policy ("GRMCP01") through legal and proper channels. Due care must be taken in ensuring that the receiving charities or sponsored organisations are valid and credible bodies.

Situations which could potentially give rise to potential conflicts of interest from making donations or sponsorships should be avoided.

Any donations or sponsorships made on behalf of the Group must obtain the necessary approvals in accordance with the relevant LOA, must be made transparently and recorded accurately.

9. PROTECTING THE GROUP AND SHAREHOLDERS

9.1 Group Assets

The Group provides employees with the necessary assets to ensure employees can perform their jobs effectively and efficiently. As such employees must protect these assets against waste, loss, damage, abuse, misuse, theft, misappropriation or infringement of Intellectual Property rights and ensure these assets are used responsibly.

9.2 Financial Information

The Group is committed to ensuring the integrity of financial information for the benefit of stakeholders, including but not limited to the Board of Directors, management, shareholders, creditors and government agencies.

As the Group relies on accounting records to produce reports, employees must ensure that all business records and documents are prepared accurately, reliably and in a timely manner.

- These records must conform to generally accepted accounting principles as well as to all applicable Malaysian laws and regulations and the laws and regulations of the jurisdiction in which the Group operates; and
- Such records are important to the Group's decision-making processes and the proper discharge of its financial, legal and reporting obligations.

Falsification of financial or any other records or misrepresentation of information may constitute fraud and can result in civil and criminal liabilities for directors, employees and the Group. Directors and employees are obliged to report false entries or omissions and to highlight questionable or improper accounting in the books and records of the Group.

9.3 Proprietary and Confidential Information

Employees may obtain information not generally available or known to the public whilst performing their duties. Such information must not be communicated or disclosed in any manner, to competitors, customers, members of trade associations or other third parties unless such communication or disclosure is authorised by the Group and does not contravene any applicable laws and regulations including without limitation the Personal Data Protection Act 2010.

Any unlawful or unauthorised disclosure of proprietary or confidential information may result in irreparable loss and/or damage to the Group, and in such cases, the Group may institute civil and criminal proceedings against the offending party and disciplinary actions including dismissal against the employee.

Employees must also ensure that proprietary or confidential information is only disclosed to other employees on a need to know basis in the course of carrying out the Group's business.

Employees must continue to preserve the proprietary and confidential information even after his/her appointment/employment has ceased, unless disclosure is required, compelled or

obliged by law or any order of any court of competent jurisdiction or any competent judicial, governmental or regulatory authority or has been made public knowledge or upon expressed direction or with expressed written approval of the Group.

9.4 Records Management

The Group's documents and records are meant for business purposes and requirements, compliance with legal, tax, accounting and regulatory laws. Employees must control and maintain such records so that they are accurate, up-to-date, legible, readily identifiable and retrievable. Employees must also ensure that all records are handled according to the appropriate level of confidentiality, in accordance with any applicable policies and procedures and in conformity with all applicable laws and regulations including without limitation the Personal Data Protection Act 2010.

9.5 Business Communication

Employees shall ensure that all business communication is clear, truthful and accurate and misleading information, speculative opinions or derogatory remarks must be avoided. This applies to communications of all kinds, including e-mail and informal notes or memos.

9.6 Social Media

Every employee has the responsibility to protect the Group's reputation. When using private social media accounts, employees must ensure that any posts made reflect personal opinions purely and does not negatively affect public perception of the Group. Precaution must be taken so as to not share any confidential and proprietary business information.

10. DEALING WITH COUNTERPARTIES AND BUSINESS PARTNERS

In dealing with counterparties and business partners, directors and employees are expected to conduct business ethically, and share the business ethics and principles prescribed in this Document with such counterparties and business partners.

10.1 Counterparties

Counterparties are selected impartially and based on merit with considerations to, among others, price, quality, service, integrity and ethical standards.

- Procurement decisions are to be made solely in the Group's best interests and in compliance with the respective procurement policies and procedures.
- Payments made shall commensurate with the services or products provided.

10.2 Customers (Business Partners)

Customers are to be provided with accurate and truthful information regarding the products and services offered by the Group. Deliberate misleading messages, omissions of key facts or false claims about the Group's product and services are not allowed.

10.3 Joint Ventures and Business Alliances (Business Partners)

The Group endeavours to work or associate with companies that share the Group's values and ethics and the principles of this Document. Joint ventures and business partners are to be given assistance in adopting, as far as practicable, the key principles laid out in this Document.

10.4 Competition and Anti-Trust Laws

Competition and anti-trust laws in the countries in which the Group operates must be complied with, so as to prevent any civil and criminal liability for directors, employees and the Group.

Generally, directors and employees must avoid the following:

- i. any formal or informal agreement or understanding that has the object or effect of significantly preventing, restricting or distorting competition in any market for goods or services; and
- ii. engaging in any conduct, which amounts to an abuse of a dominant position in any market for goods or services.

Directors and employees should refer to the GRMCP03 Group Competition and Anti-Trust Policy which describes in further detail the circumstances which should be avoided in relation to competition and anti-trust acts.

10.5 International Trade Laws

The Group's business may be subjected to laws and regulations that govern international trade. Directors, employees and counterparties whose line of work are impacted by these laws, are required to familiarise and comply with such applicable laws and regulations.

10.6 Environment, Land Access and Sustainable Development

Health and environmental risk is to be minimised by utilising natural resources responsibly and reducing waste and emissions, where practicable. As such, directors and employees must notify the respective HOD(s) and Group CEO if hazardous materials come into contact with the environment or are incorrectly handled or disposed. Directors and employees must be vigilant in adhering to environmental, health and safety laws, standards, regulations, requirements and/or policies applicable to each Company's respective operations.

In addition to applicable laws and permits tied to the land, the Group also recognises that there may be other claims to the land such as ancestral, indigenous or native titles. Where possible, appropriate bodies such as interest groups, locals and the government authorities should be consulted to clarify the rights or claims which come along with the land titles.

10.7 Insider Trading

Malaysia has insider trading laws under the Capital Markets and Services Act 2007 ("CMSA") and the Main Market Listing Requirements of Bursa Malaysia Securities Berhad that restrict securities trading and other activities by anyone who is in possession of material, non-public information.

Material, non-public information is any information not generally known to the public that on becoming generally available, would or would tend to influence reasonable persons who invest in securities in deciding whether or not to acquire or dispose of such securities (including shares, bonds and warrants issued by the company), or enter into an agreement with a view to acquire or dispose of such securities.

Any employee who is aware of material, non-public information regarding MBMR or any other company in the Group must not:

- Trade in MBMR securities,
- Disclose that information to others who may buy or sell securities because of the information, or

- Otherwise use the information for personal advantage or the personal advantage of others.

The consequences of insider trading include, but are not limited to:

- Criminal Liability under the CMSA: Fine of not less than RM1,000,000 and imprisonment of up to 10 years.
- Civil Liability under the CMSA:
 - i. By the person who suffers loss or damage by reason of, or by relying on the conduct of the offender to recover the amount of loss or damage;
 - ii. By the Securities Commission (if it considers it to be in public interest) to recover an amount not exceeding 3 times the gross amount gained or loss avoided, and civil penalty not exceeding RM1,000,000.
- Disciplinary action by the Company including termination of employment or dismissal without notice.

11. DEALING WITH GOVERNMENT AUTHORITIES AND POLITICAL PARTIES

11.1 Dealing with Regulators and Government Agencies

Divisions/Departments of Subsidiaries may be subjected to formal or informal queries, unscheduled inspections, investigations or raids by regulators and government agencies. Where such events occur, employees are to observe the proper procedures in engaging with our stakeholders, including the notification and necessary approval requirements, where applicable.

11.2 Political Activities

Directors and employees have the right to participate as individuals in the political process. However, such participation shall be carried out of the respective director/employee's own accord, volition, time and resources. Any political opinions must be clearly delivered as personal opinions and shall not in any way be representative of the Subsidiary and/or the Group's position.

Employee who wishes to hold any key position as office bearer in any political party must disclose and obtain prior approval from the Group CEO. Any employee who wishes to participate full time in politics or are nominated as candidates in any election or are elected as representatives in the Federal or State Legislative Body must resign from the respective Subsidiary.

11.3 Political Contributions

All applicable laws and regulations concerning political contributions shall be duly observed. Company funds or resources shall not be used to make any direct or indirect political contributions on behalf of the Subsidiary and/or Group without obtaining the necessary approvals under the Company's LOA. Directors and employees shall also avoid from creating the appearance of making such contributions or expenditure to any political party, candidate or campaign on behalf of the Company or the Group.

Corporate political contributions are strictly regulated and require the necessary approval.

Political contributions or expenditures include, but not limited to:

- Paying for advertisements and other political campaign expenses;
- Buying tables for fundraising dinners organised by a political party; and/or
- Loaning employees to support political events during working hours.

However, directors and employees who wish to contribute their own time or money to any political activity or fund, shall be deemed to be doing so on an entirely personal and voluntary nature. The Group hereby disclaims all connections or associations in relation to its director's or employees' personal political contributions.

11.4 Anti-Money Laundering and Anti-Terrorism Financing

The Group is prohibited from being involved in money laundering activities, either directly or indirectly and shall observe the provisions of the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 ("AMLA") and any other relevant provisions of similar nature.

These activities may include the following:

- Payments made in currencies that differ from invoices;

- Attempts to make payment in cash or cash equivalent (out of normal business practice or the limits specified by Bank Negara Malaysia);
- Payments made by third parties that are not parties to the contract; and
- Payments to or accounts of third parties that are not parties to the contract.

Reasonable verifications should be made in the event of occurrence of the above activities, to ensure that there is no contravention of AMLA and/or similar regulations. Employees should exercise good judgment and be vigilant in assessing whether any transactions give rise to suspicion of potential money laundering activities.

- End –

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