



KERJAYA PROSPEK GROUP BERHAD

Registration No. 198401010054 (122592-U)

CODE OF BUSINESS ETHICS FOR BUSINESS ASSOCIATES (“COBE” or “Code”)

1. Introduction and Scope

- 1.1. This Code of Business Ethics for Business Associates (“COBE”) of Kerjaya Prospek Group Berhad (“Kerjaya” or the “Company”) sets out the standards of ethical business practices and conduct that the Kerjaya and its subsidiaries (“Kerjaya Group” or the “Group”) expect in relation to the following:
 - (a) all contractors/subcontractors engaged by the Group and their employees/workers;
 - (b) in all construction sites managed by the Group, including business associates carrying out work at these sites; and
 - (c) key business associates such as associate companies, JV partners, key suppliers, or key service providers, as applicable, and their employees/workers.
- 1.2. It is expected that the principles of this Code be upheld by all parties mentioned above (referred to as “All Parties”) in all countries in which the Group operates.

2. Complying with laws and regulations

- 2.1. All Parties shall comply with applicable laws and regulations.
- 2.2. All Parties are expected to understand and familiarise themselves with applicable laws and regulation, in relation to, but not limited to, the following:
 - (a) fair competition;
 - (b) anti-bribery and anti-corruption;
 - (c) anti-money laundering and anti-terrorism financing;
 - (d) insider trading and market manipulation;
 - (e) pollution prevention and environmental protection;

- (f) labour and employment practices;
- (g) occupational safety and health; and
- (h) human rights.

3. Ethical business

- 3.1. The Group is committed to conducting business ethically, fairly, and with integrity. All Parties are expected to uphold similar standards.

4. Anti-bribery

- 4.1. The Group maintains a zero-tolerance stance towards corrupt behaviours.
- 4.2. The Group does not tolerate any conduct of offering, giving, soliciting, or receiving bribes, by anyone for any purpose, in relation to the Group's business or operations.
- 4.3. All Parties shall comply with the Group's Anti-Bribery and Corruption Policy & Guidelines.

5. Human Rights

- 5.1. All Parties shall ensure no child labour or forced labour is practised in the construction sites managed by the Group.
- 5.2. The Group does not work with business associates with known, existing child labour or forced labour practices.
- 5.3. All Parties shall respect employees' freedom of association and rights to collective bargaining in accordance with applicable laws and regulations.

6. Employment and Labour Practices

- 6.1. All Parties shall comply with applicable employment-related laws and regulations in relation to the following:
 - (a) minimum wage; and
 - (b) maximum working hours and minimum rest time.
- 6.2. All Parties shall comply with applicable occupational safety and health laws and regulations in relation to the Group's operations and construction sites managed by the Group.

7. Environmental

- 7.1. All Parties shall comply with environmental-related laws and regulations, including pertaining to discharge, pollution, and noise, in relation to the Group's operations and construction sites managed by the Group.
- 7.2. In relation to the construction sites managed by the Group, contractors/subcontractors are encouraged to:
 - (a) reduce wastage of and efficiently consume resources such as water, energy, and materials;
 - (b) reduce generation of waste;
 - (c) optimise the recycling or reuse of waste generated; and
 - (d) reduce greenhouse gas emissions.
- 7.3. In relation to the construction sites managed by the Group, contractors/subcontractors are expected to support the Group's environmental management efforts including enabling data collection, management, and monitoring of environmental performance in relation to the use of resources including water, materials, and energy and in relation to greenhouse gas emissions and waste.

8. Protection of information

- 8.1. All Parties shall exercise caution and due care to safeguard any information, particularly those of confidential and sensitive nature, obtained in the course of their service with the Group.
- 8.2. All Parties shall not utilise these information or knowledge for their own personal advantage, directly or indirectly.

9. Integrity of Capital Markets

- 9.1. All Parties shall not, directly or indirectly, conduct trading based on inside information which has yet to be publicly disclosed in relation to the Group or its business, regardless whether he/she will be personally benefited.

10. Anti-Money Laundering and Anti-Terrorism Financing

- 10.1. The Group does not engage in any money laundering or terrorism financing activities and its does not associate itself with such criminal activities of others within its business operations or value chain.

11. Accountability

- 11.1. The Group expects contractors/subcontractors and key Business Associates to be accountable for the delivery of their contractual obligations, including services rendered and goods provided, on a timely basis in accordance with specific agreements, contracts, or undertaking made with the Group.

12. Conditional Audit on Suppliers and Business Associates

- 12.1. Depending on the circumstances, the Group may impose a requirement for the performance of an audit on its contractors/subcontractors or Business Associates in relation to adherence to this Code, as a condition for establishing new business relationships or continuing existing business relationship, as and when necessary.

13. Compliance and Support

- 13.1. All Parties with any concerns or queries or requiring support and advice pertaining to compliance with this Code shall consult with their respective internal reporting lines or liaisons within the Group.
- 13.2. If there is a suspected violation or potential violation of this Code, such cases may be reported via the Group's whistle-blowing mechanism.
- 13.3. No individual will be discriminated against, or suffer any sort of retaliation, by the Group or its personnel for raising genuine concerns or reporting in good faith on violations or suspected violations of this Code. All reports will be treated confidentially.

14. Review of this Code

- 14.1. This Code is approved by the Board of Directors of Kerjaya on 28 August 2026.
- 14.2. This Code shall be reviewed by the Company periodically or at least once in three years.