MYDCD BERHAD

Registration No.: 202501030429 (1631841-A)
(Incorporated in Malaysia)

CODE OF ETHICS AND CONDUCT

1. INTRODUCTION

This Code of Ethics and Conduct outlines the fundamental principles and standards expected from all Directors and employees of MyDCD Berhad ("the Company") and its subsidiaries (collectively known as the "Group") in the performance of their duties. The Group is committed to fostering a culture of ethical conduct, transparency, and accountability. It is the responsibility of all individuals to uphold these standards and comply with applicable laws, rules, and regulations, including the Constitution of the Group.

The Group expects all Directors and employees to uphold these standards, ensuring the integrity and reputation of the Group. The adherence to this Code of Ethics and Conduct is essential for fostering a culture of trust, respect, and accountability, and it is integral to the long-term success of the Group.

2. CORE PRINCIPLES

All Directors and employees of the Group must adhere to the following core principles while conducting the business of the Group:-

(a) Adherence to the Code of Ethics and Conduct

To comply with the provisions set forth in this Code of Ethics and Conduct at all times. This ensures consistency and integrity in the professional behavior.

(b) High Standards of Business, Professional, and Ethical Conduct

To maintain the highest standards of business, professional, and ethical conduct, refraining from accepting gifts or other forms of benefits that may reasonably influence their performance or objectivity in their duties.

(c) Ethical Principles

Directors and employees are expected to adhere to the principles of:-

- Selflessness: Placing the interests of the Group and the public above personal interests.
- Integrity: Acting with honesty and fairness in all situations.
- Objectivity: Making decisions based on facts, free from personal bias.
- Accountability: Accepting responsibility for personal actions and decisions.
- Openness: Acting transparently and communicating openly, particularly when transparency is essential for the effective operation of the Group.
- Honesty: Ensuring truthful and complete communication at all times.
- Leadership: Demonstrating ethical leadership by setting a positive example.

Furthermore, all Directors and employees must handle any conflicts of interest in an ethical manner.

(d) Use of Information

Directors and employees are prohibited from using information obtained during the course of their duties for personal gain or for political purposes. All information related to the Group's activities must be used solely for the benefit of the Group.

(e) Accountability and Good Faith

Directors and employees must act with accountability, ensuring that their actions are in good faith and serve the best interests of the Group. This includes safeguarding the Group's corporate opportunities, assets, and confidential information.

(f) Protection of Corporate Interests

Directors and employees must protect the Group's legitimate business interests. This includes the safeguarding of corporate opportunities, assets, intellectual property, and confidential information to ensure the Group's ongoing success and competitive advantage.

(g) Transparent Disclosure

All Directors and employees are required to provide full, fair, accurate, timely, and understandable disclosure in any communications relating to the Group's operations, financial matters, or other important areas, as required by law and the Group's policies.

(h) Declaration of Conflicts of Interest

Any Director or employee who has a personal, professional, or business interest, or a potential conflict of interest that could conflict with their responsibilities, must declare such conflicts in writing. Conflicts of interest must be disclosed to appropriate personnel and handled according to the Group's conflict-of-interest policies.

3. VIOLATIONS AND DISCIPLINARY ACTIONS

In the event of a violation of this Code of Ethics and Conduct by any Director or employee, the Board of Directors ("Board") will take appropriate action based on an evaluation of all relevant facts and circumstances. Possible actions include:-

- Formal reprimands
- Disciplinary measures
- Termination of employment or directorship, where applicable

The Board will have the final decision regarding any disciplinary actions to be taken, ensuring that any violations are handled in a fair and consistent manner.

4. REVIEW OF THE CODE OF ETHICS AND CONDUCT

The Board will review this Code of Ethics and Conduct from time to time and make any necessary amendments to ensure they remain consistent with the Board's objectives, current law and practices.

This Code of Ethics and Conduct (Version No. 1) was reviewed and approved by the Board on 24 December 2025.